

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	Honorable Judge Bucklo
	)	
Plaintiff,	)	Magistrate Mason
-vs-	)	NO. 08 CR 151
	)	
TOMITA INYANG,	)	
	)	
Defendant.	)	

**DEFENDANT'S MOTION TO VACATE THE DETENTION ORDER**  
**AND ALLOW RELEASE ON BOND**

NOW COMES the Defendant, TOMITA INYANG( his correct name is Inyang Tomita), by and through his attorney, ROBERT HABIB, and moves this Honorable Court to vacate the Detention Order entered 1/08/07, and allow Defendant's release on bond, and in support thereof, states as follows:

1. That the Court entered an Order on 1/8/08 detaining Defendant, pending trial of this matter, on the grounds that he is a serious risk of flight and that there were no conditions which could reasonably assure his appearance.

2. That the Order was entered without prejudice to defendant, bringing a subsequent Motion to Vacate.

3. That the Defendant's fiancé, Kareemat Olorunoje, and her mother, Toyin Daniels, are prepared to act as co-signors on the bond, and can now put up \$10,000.00 in cash as bail.

4. That the Defendant has been in the United States for 10 years. He has never had a bond forfeiture entered against him, and has always appeared in Court.

5. In this matter, Defendant was aware of the pending investigation for at least one month prior to his arrest, yet made no attempt to flee.

6. That if Defendant is released, he can stay with Kareemat Olarunaje, and her mother, Toyin Daniels, at their apartment at 7111 N. Paulina St., Apt. 2, Chicago, Illinois.

7. That there are numerous conditions which can ensure his attendance at trial, including his lack of a passport, electronic monitoring, and the fact that Defendant has always appeared for Court, and his close ties to Kareemot Olorunoje, who has no intention of leaving the U.S. (She is a U.S. Citizen). Her affidavit is attached.

**WHEREFORE**, the Defendant prays that this Honorable Court vacate the Detention Order, and allow Defendant's release on a \$10,000.00 cash bond.

/s/Robert Habib  
ROBERT HABIB

ROBERT HABIB  
Attorney for Defendant  
77 W. Washington St., Suite 411  
Chicago, IL 60602  
(312) 201-1421